

From: [Yetta G. Kurland](#)
To: [Tucker, Jacob P.](#); [Minicucci, Lora \(LAW\)](#); [David B. Rankin](#); [Tala Alfogaha](#)
Cc: [Phillion, Rachel S.](#); [Bashinski, Hayden F.](#)
Subject: RE: Local 2507: 5/29/25 joint letter
Date: Friday, June 6, 2025 4:06:18 PM

Hi Tucker,

Thank you. We are confirmed. Also below is a summary of our call today and next steps:

1. We will submit the Joint Letter re Plaintiffs 4th RFP on June 27, 2025. We will provide you a updated draft on June 24, 2025. To the extent we can resolve anything else we can reach out in the interim.
2. We will submit a joint letter re continuing disputes on issues from Judge Gorenstein's May 14, 2025 ruling by July 3, 2025. We will get you a draft version of our letter by June 30, 2025.
3. Parties are in dispute about Defendant's failure to produce a column or row showing total pay. Defendant says just count up the row. Plaintiffs explain this would be time consuming and are Defendant later going to dispute those totals? Plaintiffs will confer with their experts and revert back if this is something they can forgo, otherwise parties are at impasse.
4. As to negative time (-6.499999999999) Defendant represents that that is the time not paid from regular pay that period. Plaintiffs will confer with expert to see if that is a sufficient explanation or if there are any other errors in Demo/Pay Data or other datasets. To the extent there are additional issues with datasets Plaintiffs will attempt to get that to Defendant in advance of deadline to file letter so they can research and hopefully resolve without need for Court intervention.
5. As to issues with missing information on examination information (open and promotional), Defendant will check to see if they have only produced those who passed the examinations, also there is some confusion over what has been produced, namely we do not have the open examination information Lora referenced on the call that she said is Bates stamped ending 36059. 36059 is 1997 exam information (Exam No. 7514) as received by Plaintiffs. Defendant will also confirm if they will produce the exam score and a list of anyone who was found ineligible separate from the examination. They will let us know by June 13, 2025 if they will produce that information.
6. Parties are at impasse regarding the request to produce the rank/title for examination lists.
7. Plaintiffs will wait to get the updated injury/illness information to see if the issue of determining frequency and severity of injuries can be resolved.
8. Defendant will review the sample of redundant injuries entered and parties can follow up on the issue. Defendant insists that each entry is a separate incident, the data does not seem to support that. This seems like something that can be easily cleared up.

9. Defendant is unsure where the updated injury/illness data is coming from. Plaintiffs has requested this information be produced with the datasets.
10. For ESI Defendant will get us proposed list of custodians by June 13, 2025 and respond to our proposed adjustments to search terms from our email on June 3, 2025.
11. Parties will meet and confer on June 9, 2025 at 12pm in a final attempt to resolve 30(b)(6) topics served December 11, 2024.

Have a good weekend.

Best,

Yetta

Yetta G. Kurland, Esq.

Senior Partner

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From: Tucker, Jacob P. <jtucker@proskauer.com>

Sent: Friday, June 6, 2025 3:36 PM

To: Yetta G. Kurland <kurland@kurlandgroup.com>; Minicucci, Lora (LAW) <lminicuc@law.nyc.gov>; David B. Rankin <drankin@blhny.com>; Tala Alfoqaha <talfogaha@blhny.com>

Cc: Philion, Rachel S. <rphilion@proskauer.com>; Bashinski, Hayden F. <HBashinski@proskauer.com>

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Yetta –

12-1 on Monday works on our end.

Best,